



U.S. Department of Transportation
**National Highway Traffic Safety
Administration**

1200 New Jersey Avenue SE
Washington, DC 20590

July 26, 2016

Mr. Scott Spence
Director - Product Development
Combi USA, Inc.
3520 Westinghouse Blvd.
Suite B
Charlotte, NC 28273

NEF-150KS
16C-006

Subject: Excessive Force Transmitted to Child/FMVSS 213

Dear Mr. Spence:

This letter serves to acknowledge Combi USA, Inc.'s notification to the National Highway Traffic Safety Administration (NHTSA) of a safety recall which will be conducted pursuant to Federal law for the product(s) listed below. Please review the following information to ensure that it conforms to your records as this information is being made available to the public. If the information does not agree with your records, please contact us immediately to discuss your concerns.

Makes/Models/Model Years:
COMBI/8220 (COCCORO)/9999

Mfr's Report Date: June 29, 2016

NHTSA Campaign Number: 16C-006

Components:
CHILD SEAT

Potential Number of Units Affected: 39,395

Problem Description:

Combi USA, Inc. (Combi) is recalling certain Coccoro Convertible Child Restraints, model number 8220, manufactured January 1, 2009, to June 29, 2016. When the Coccoro car seat is installed in a forward facing position and only secured with the vehicle's lap belt, excessive force may be transmitted to the car seat occupant in the event of a crash, increasing their risk of injury. As such, these child seats fail to comply with the requirements of Federal Motor Vehicle Safety Standard (FMVSS) number 213, "Child Restraint Systems."

Consequence:

In the event of a crash, the seat occupant is at an increased risk of injury.

Remedy:

Combi will notify owners, and provide them with a cover to be added to the bottom of the seat, free of charge. The recall is expected to begin in July 2016. Owners may contact Combi customer service at 1-888-232-3294, or by going to <http://registration.combiusa.com/recall>. Combi's number for this recall is 610. Note: This recall does not affect the use of the Coccoro child restraint when it is installed in a rearward-facing position.

Notes:

Owners may also contact the National Highway Traffic Safety Administration Vehicle Safety Hotline at 1-888-327-4236 (TTY 1-800-424-9153), or go to www.safercar.gov.

We note that your 573 report states that Combi believes that the subject child restraints present a very low to no risk in real world (non-test) situations. In our view, this statement has no force or effect in terms of Combi's obligation to undertake and complete the recall and NHTSA does not agree with it.

Under 49 U.S.C. § 30112(a), it is illegal for anyone, including a manufacturer, distributor, dealer, or retailer to sell an item of equipment or vehicle that fails to comply with all applicable Federal motor vehicle safety standards.

We have received Combi's proposed owner notification letter and it is currently under review. You will be notified of any changes or concerns once our review is complete.

Please be reminded of the following requirements:

Copies of all notices, bulletins, dealer notifications, and other communications that relate to this recall, including a copy of the final owner notification letter and any subsequent owner follow-up notification letter(s), are required to be submitted to this office no later than 5 days after they are originally sent (if they are sent to more than one manufacturer, distributor, dealer, or purchaser/owner).

As stated in Part 573.7, submission of the first of six consecutive quarterly status reports is required within one month after the close of the calendar quarter in which notification to purchasers occurs. Therefore, the first quarterly report will be due on, or before, 30 days after the close of the calendar quarter.

Your contact for this recall will be Kelly Schuler who may be reached by phone at (202) 366-5227, or by email at kelly.schuler@dot.gov or through the office email at rmd.odi@dot.gov. We look forward to working with you.

Sincerely,



Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigations
Enforcement